

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRIANNA GREENE on behalf of herself and)	
others similarly situated,)	1:10-cv-117
Plaintiff,)	
)	
v.)	Judge Kocoras
)	
DIRECTV, INC., and)	Magistrate Judge Cox
IQOR, INC.)	
Defendant.)	JURY DEMANDED

[UNOPPOSED] MOTION TO DISCLOSE INFORMATION

Plaintiff respectfully requests that this Court enter an order permitting DIRECTV to provide unredacted information concerning the account that is the subject of this lawsuit, in discovery.

In support of this motion, plaintiff states:

1. Plaintiff Brianna Greene brought this action pursuant to the Fair Credit Reporting Act, 15 U.S.C. §1681 et seq. and the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq, including implementing regulations and applicable FCC orders ("TCPA").
2. Plaintiff believes that Larquette Green used plaintiff's social security number to open a DIRECTV satellite television account. The case revolves around how DIRECTV handled a "fraud alert" notification it received from a credit bureau regarding this account.
3. Plaintiff issued discovery to DIRECTV, including discovery aimed at learning about the account that was opened, including what information the other consumer provided DIRECTV in association with the satellite television application.

4. DIRECTV has taken the position that it is prohibited from providing any personally identifiable information concerning the transaction pursuant to the Satellite Home Viewer Extension and Reauthorization Act of 2004, 47 U.S.C. §338 ("SHVERA"). Thus, it has provided plaintiff with documents relating to the account in question that have substantial redactions, including the social security number, the full address and telephone number, subscription information, and other such information.

5. Plaintiff disagrees with DIRECTV's position, and believes, among other reasons, that DIRECTV has a duty to respond to discovery that supersedes SHVERA.

6. However, without waiving any SHVERA arguments pertaining to putative class members, DIRECTV has indicated that it recognizes the specific circumstances here, in which Plaintiff already possesses all of Larquette Green's personal information from Plaintiff's other lawsuits involving credit bureau's mixing of her information with Larquette Green's. Because of the nature of this particular case, DIRECTV has agreed not to oppose this motion and will agree to disclose Larquette Green's personal information on a Confidential basis upon order of this Court and so long as Larquette Green receives notice of the disclosures.

WHEREFORE Plaintiff respectfully requests that this Court enter an order permitting DIRECTV to provide unredacted information in discovery concerning the Larquette Green account that is the subject of this lawsuit.

Respectfully submitted,

/s/Alexander H. Burke

Alexander H. Burke

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[PROPOSED] ORDER

The Court hereby orders that defendant DIRECTV, Inc. provide plaintiff with unredacted information concerning Larquette Green.

DATE

UNITED STATES DISTRICT COURT